

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|                           |   |                                   |
|---------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA, | ) |                                   |
|                           | ) |                                   |
| Plaintiff,                | ) |                                   |
|                           | ) |                                   |
| vs.                       | ) | Cause No. 4:13-CR-00231-RWS (TCM) |
|                           | ) |                                   |
| JACK FRISON, SR.,         | ) |                                   |
|                           | ) |                                   |
| Defendant.                | ) |                                   |
| _____                     | ) |                                   |

**MOTION TO CONTINUE VOLUNTARY SURRENDER DATE**

COMES NOW, Defendant Jack Frison, Sr. ("Frison"), by and through his attorneys, who hereby moves the Court to continue his voluntary surrender date to the Bureau of Prisons ("BOP"). In support of said motion, Defendant states as follows:

1. Defendant was sentenced on January 29, 2015, to serve a term of 24 months in the Bureau of Prisons ("BOP").
2. The Court permitted Frison to remain on bond and surrender voluntarily to BOP.
3. Defendant was given a voluntary surrender date of March 12, 2015. Absent a continuance of the aforementioned date, Frison must report to USP Leavenworth, 1300 Metropolitan, Leavenworth, KS 66048, by 1:00 p.m. on said date.
4. Defendant respectfully requests a continuance of his voluntary surrender date, up to and including, June 1, 2015, in which to surrender voluntarily to the BOP. Frison seeks a continuance of the above surrender date so that he can attend the previously scheduled wedding of his daughter, Julie Ann Frison, which will take place on Friday, May 29, 2015, in St. Louis, Missouri.

5. In further support of said continuance, prior to receiving knowledge of his surrender date, Defendant scheduled follow-up examinations at the VA Hospital with an internist and with another doctor regarding Defendant's back issues. Unfortunately, the earliest date that these individuals can see the Defendant at the VA Hospital is at the end of the month. Defendant sought these follow-up appointments to determine the need for surgery and/or additional medication and for the purpose of providing the BOP with the most accurate and up-to-date information regarding the Defendant's ailments.

6. Finally, the Defendant is involved in the related civil case also before the Court. Currently, there is a settlement conference scheduled for March 13, 2015. A continuance of the above surrender date would permit the Defendant to attend said conference.

7. The undersigned has consulted with Assistant United States Attorney, John Bodenhausen regarding the instant motion. The Government has no objections to the requested continuance.

WHEREFORE, Frison respectfully requests that the Court grant the requested relief and permit him to surrender voluntarily to the BOP on June 1, 2015, and for such other and further relief that the Court deems just and proper.

Dated: March 3, 2015.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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*Attorney for Defendant, Jack Frison, Sr.*

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|                           | ) |                                   |
| Defendant.                | ) |                                   |
| _____                     | ) |                                   |

**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. John M. Bodenhause and Ms. Jennifer Roy, Assistant United States Attorneys.

**Motion to Continue Voluntary Surrender Date**

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